

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ROBERT SULLIVAN,

Plaintiff,

v.

SELENE FINANCE, LP, *et al.*,

Defendants.

No. 1:16-cv-11719- MPK

**DECLARATION OF  
ADAM DEUTSCH IN  
SUPPORT OF PLAINTIFF'S  
PETITION FOR AWARD OF ATTORNEYS'  
FEES AND COSTS**

I, Adam Deutsch, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. § 1746, that the following statements are true:

1. I am a member in good standing of the Massachusetts State Bar. I make this Declaration in support of Plaintiff's Motion for Attorney's Fees and Costs.

**Counsel's Relevant Knowledge And Experience**

2. I was admitted to practice law in 2010. And have been selected to Super Lawyers Rising Stars yearly since 2017.

3. I am the founder of Northeast Law Group, LLC, located in Longmeadow, MA, where we focus the majority of our practice in the area of protecting consumer rights in Massachusetts and New Jersey.

4. Since 2010, I have represented an excess of 300 of consumers in the exercise of their rights under both federal and state consumer protection laws.

5. I am an active member of the National Association of Consumer Advocates.

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6. In 2018, I hosted a consumer protection seminar in Springfield, MA, providing consumers with information on how to deal with erroneous credit reporting, aggressive debt collectors, and other common issues.

7. I have personal knowledge and experience regarding the standard hourly rates charged by consumer protection attorneys in the State of Massachusetts, having practiced in this area of law for over a decade.

**David Chami's Requested Rate**

8. I have reviewed the Declaration of David Chami and the rates requested in Plaintiff's petition for fees.

9. I am aware of David Chami's work in consumer protection, and specifically his representation of consumers bringing claims under the Fair Credit Reporting Act.

10. I am aware that David Chami is a frequent lecturer for the National Association of Consumer Advocates.

11. Given the prevailing rates in the market, my review of counsel's declaration and petition, my knowledge of Mr. Chami's success and reputation in the field of consumer protection litigation, and my experience in litigating consumer protection fee-shifting cases in Massachusetts, I believe the rates sought by Mr. Chami in this case are reasonable for an attorney of comparable skill, experience, and reputation practicing in the Boston area.

**Requested Costs**

12. In Massachusetts, it is customary for lawyers to bill clients separately for the costs associated with litigation. These costs include expert witness fees, court reporter

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fees, copying costs, postage, travel, etc. These costs are customarily billed in addition to the attorney's regular hourly rate.

**Declaration Regarding Relation To This Case**

- 13. I am not related to any of the parties in this action.
- 14. I have no financial interest in this case.
- 15. I am receiving no compensation for submitting this declaration.

I declare under penalty of perjury and under the laws of the State of Massachusetts that the foregoing is true and correct.

December 16, 2021.

A handwritten signature in black ink, appearing to read 'Adam Deutsch', is written over a horizontal line.

Adam Deutsch, Esq.(BBO569173)